

Douglas Weiner, Esq.  
David J. Clark, Esq.  
EPSTEIN BECKER & GREEN, P.C.  
250 Park Avenue  
New York, New York 10177-1211  
Tel: 212.351.4500  
[dweiner@ebglaw.com](mailto:dweiner@ebglaw.com)

Attorneys for Defendants  
Cabana Management, Inc. and Glenn Frechter

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

GERARDO VALDEZ LUJAN, individually and on behalf  
of all other persons similarly situated who were employed  
by CABANA MANAGEMENT, INC. and/or GLENN  
FRECHTER; and/or any other entities affiliated with or  
controlled by CABANA MANAGEMENT, INC. and/or  
GLENN FRECHTER,,

Plaintiffs,

- against -

CABANA MANAGEMENT, INC. and/or GLENN  
FRECHTER, and/or any other entities affiliated with or  
controlled by CABANA MANAGEMENT, INC. and/or  
GLENN FRECHTER,

Defendants.

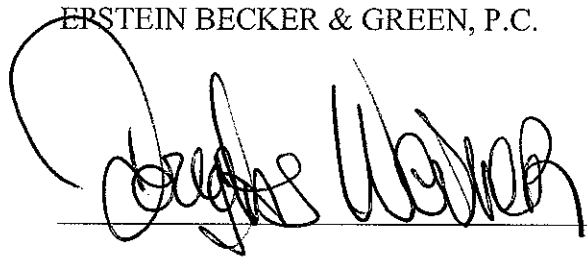
10 Civ. 0755-ILG-RLM

ECF CASE

**NOTICE OF DEFENDANTS'  
MOTION TO STRIKE  
DECLARATIONS  
SUBMITTED BY PLAINTIFF  
IN OPPOSITION TO  
DEFENDANTS' MOTION  
FOR DECERTIFICATION OF  
PLAINTIFF'S FLSA  
COLLECTIVE ACTION**

PLEASE TAKE NOTICE, that upon the Declaration of Douglas Weiner, Esq., the  
exhibit thereto, and the accompanying Memorandum of Law filed herein, Defendants hereby  
move this Court for an Order striking declarations submitted by Plaintiff on August 5, 2011 in  
opposition to Defendants' July 5, 2011 motion for decertification of Plaintiff's FLSA collective  
action.

EPSTEIN BECKER & GREEN, P.C.

A handwritten signature in black ink, appearing to read "Douglas Weiner", is written over a horizontal line.

Dated: August 16, 2011

Douglas Weiner  
250 Park Avenue  
New York, New York 10177-1211  
Tel: 212.351.4500  
dweiner@ebglaw.com

Attorneys for Defendants  
Cabana Management, Inc. and Glenn Frechter